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**From:** Aubee, Catherine [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=18E81C76BBA145F1948ED5641919DEB1-AUBEE, CATHERINE]  
**Sent:** 4/9/2020 12:16:35 PM  
**To:** Leifer, Kerry [Leifer.Kerry@epa.gov]  
**Subject:** RE: PFAS -- Replacement Attachment

Sounds good. Thanks!

Best,  
Catherine

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**From:** Leifer, Kerry <Leifer.Kerry@epa.gov>  
**Sent:** Thursday, April 09, 2020 8:16 AM  
**To:** Aubee, Catherine <Aubee.Catherine@epa.gov>  
**Subject:** RE: PFAS -- Replacement Attachment

Thanks Catherine, maybe we can discuss this for a few minutes after the 9 am conf call.

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Kerry Leifer, Chief  
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e-mail: [leifer.kerry@epa.gov](mailto:leifer.kerry@epa.gov)

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**From:** Aubee, Catherine  
**Sent:** Thursday, April 09, 2020 7:23 AM  
**To:** Leifer, Kerry <Leifer.Kerry@epa.gov>  
**Cc:** Britten, Anthony <Britten.Anthony@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>  
**Subject:** Re: PFAS -- Replacement Attachment

Thanks, Kerry. So that we're on the same page, which definition are you using? I recommend being very explicit. The defining feature in my pre-RD work on this is the carbon chain (short chain or long chain). The nature of this chain (short v. long) can be predictive of both toxicity and potential for persistence in the body. If I recall, broflanilide has a heptafluoryl ring but there is no carbon chain.

I think the main ask from OLEM on this round was on the registration status of the chemicals but the discussion is still helpful. Since broflanilide is pending, we'll want to ensure the team is characterizing it as accurately as possible when the proposed decision goes up.

Best,  
Catherine  
Associate Director (Acting)

On Apr 8, 2020, at 6:10 PM, Leifer, Kerry <[Leifer.Kerry@epa.gov](mailto:Leifer.Kerry@epa.gov)> wrote:

Broflanilide is basically the same situation

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On Apr 8, 2020, at 6:07 PM, Leifer, Kerry <[Leifer.Kerry@epa.gov](mailto:Leifer.Kerry@epa.gov)> wrote:

Flubendiamide may be considered a PFAS by the most expansive definition of a PFAS compound. It certainly doesn't have the "classic" structure of PFAS so I would say no but some may say yes

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